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DIAMOND RESORTS INTERNATIONAL
MARKETING, INC., HILTON GRAND VACATIONS
INC. AND NOAH BLOOM

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LILIANE KELAA,

Plaintiff,

v.

DIAMOND RESORTS INTERNATIONAL,
INC., a Delaware Corporation; HILTON
GRAND VACATIONS INC., a Delaware
corporation as successor-in-interest; NOAH
BLOOM, an individual; DOES I through X,
inclusive; and ROE BUSINESS ENTITIES, I
through X, inclusive,

Defendants.

Case No. 2:22-cv-00554-JAD-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
DEADLINES**

(SECOND REQUEST)

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendants DIAMOND RESORTS INTERNATIONAL MARKETING, INC. (incorrectly identified as Diamond Resorts International, Inc.), HILTON GRAND VACATIONS INC. AND NOAH BLOOM (collectively referred to as “Defendants”) and Plaintiff LILIANE KELAA (“Plaintiff”) (collectively, the “Parties”), hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 34) by extending the outstanding discovery deadlines for a period of ninety (90) days.

1 This is the second request for an extension to the Discovery Plan and Scheduling Order in this
2 matter. The requested extension is sought in good faith and not for purposes of undue delay. This
3 request is submitted at least twenty-one (21) days or more before the expiration of the subject
4 deadlines.

5 **DISCOVERY COMPLETED**

6 The parties have exchanged their initial disclosures and have begun producing documents.
7 Defendant has produced 299 pages of documents so far in this matter while Plaintiff has produced 52
8 pages. Defendants propounded their First Set of Interrogatories and Requests for Production of
9 Documents on October 7, 2022. Defendants propounded their Second Set of Requests for Production
10 of Documents on November 8, 2022.

11 Plaintiff served her first supplemental disclosures on October 19, 2022, producing 19 audio
12 recordings and 6 additional pages of documents. Plaintiff served her second supplemental disclosures
13 on October 26, 2022, producing 62 additional pages of documents. Defendants served their first
14 supplemental disclosures on October 26, 2022, producing 58 additional pages of documents.

15 Plaintiff responded to Defendants' First Set of Interrogatories and Requests for Production of
16 Documents on November 7, 2022 and produced no additional documents. Plaintiff's responses are
17 currently the subject of a meet and confer letter issued by Defendants on November 23, 2022.

18 Plaintiff propounded her First Set of Interrogatories and Requests for Production of Documents
19 on November 23, 2022

20 **DISCOVERY REMAINING TO BE COMPLETED**

21 The parties continue to meet and confer concerning written discovery in the case. Defendants
22 intend to serve third party subpoenas but cannot do so until Plaintiff executes the necessary
23 authorizations and responds to the discovery requests. Defendants will further require the subpoenaed
24 records before it can evaluate whether expert discovery is warranted. Defendants will take Plaintiff's
25 deposition together with any percipient witnesses. Plaintiff also intends to take depositions.

26 **REASONS FOR REQUESTED EXTENSIONS**

27 This extension is necessary to allow both parties ample time to complete all appropriate
28 discovery. Specifically, the expert disclosure deadline is currently on December 29, 2022, however

1 additional time is needed to meet and confer regarding Plaintiff's responses to the First Set of
 2 Interrogatories and Requests for Production of Documents, receive and review any supplemental
 3 discovery responses, and send and receive responses to third-party subpoenas before it can be
 4 determined whether expert discovery is warranted in this case such that it would not be feasible to do
 5 so with the current deadline of December 29, 2022. Further, this matter is set for a continued Early
 6 Neutral Evaluation ("ENE") on February 7, 2023 and the parties prefer to participate in the ENE
 7 process before engaging in the expense of possible expert discovery. *See* ECF No. 35. Finally, the
 8 parties anticipate needing additional time to take depositions and conduct additional third-party
 9 discovery. The Parties believe that, absent any unforeseen circumstances, all necessary discovery can
 10 be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in
 11 order to permit the parties to achieve their respective stated discovery goals.

12 **PROPOSED REVISED DISCOVERY PLAN**

13 1. The Parties' current deadline for Expert Disclosures is December 29, 2022. The Parties
 14 request that the Court extend that deadline to March 29, 2023.

15 2. The Parties' current deadline for Rebuttal Expert Disclosures is January 30, 2023. The
 16 Parties request that the Court extend that deadline to May 1, 2023¹.

17 3. The Parties' current deadline for completing discovery is February 27, 2023. The
 18 Parties request that the Court extend that deadline to May 29, 2023².

19 4. The Parties' current deadline for filing dispositive motions is March 29, 2023. The
 20 Parties request that the Court extend that deadline to June 27, 2023.

21 5. The Parties' current deadline for filing the Joint Pretrial Order is April 28, 2023. The
 22 Parties request that the Court extend that deadline to July 27, 2023. In the event dispositive motions
 23 are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the
 24 Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

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27 _____
 28 ¹ Original deadline lands on Sunday, April 30, 2023, moved to following Monday.

² Original deadline lands on Sunday, May 28, 2023, moved to following Monday.

1 The Parties make this stipulation in good faith and not for the purposes of undue burden or
2 delay.

3
4 Dated: November 30, 2022
5 HONE LAW

Dated: November 30, 2022
LITTLER MENDELSON, P.C.

6
7 */s/ Jill Garcia, Esq.*
JILL GARCIA, ESQ.
8 AMY L. HOWARD, ESQ.
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/s/ Diana G. Dickinson, Esq.
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9 Attorneys for Plaintiff
10 LILIANE KELAA

Attorneys for Defendants
DIAMOND RESORTS INTERNATIONAL
MARKETING, INC., HILTON GRAND
VACATIONS INC. AND NOAH BLOOM

11
12 **IT IS SO ORDERED.**

13 Dated: December 1, 2022

14 
15 UNITED STATES MAGISTRATE JUDGE

16 4885-1844-8448.1 / 104088-1025